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[www.htiwcoalition.org](http://www.htiwcoalition.org)

May 4, 2022

Kimberly Stille  
Director, Enforcement Programs  
Occupational Safety and Health Administration  
200 Constitution Avenue NW Washington DC 20210

Re: PSP 2022 - Voluntary Product Stewardship Program for Refractory Ceramic  
Fibers

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Dear Director Stille:

The manufacturers of refractory ceramic fibers (RCF) who comprise the membership of the HTIW Coalition remain committed to the continued protection of the health and safety of their employees and all others who use or handle RCF. Building on its prior commitment to voluntary product stewardship, the HTIW Coalition is pleased to present the most recent version of its comprehensive Product Stewardship Program (PSP) for RCF, to be known as PSP 2022. The Coalition believes that PSP 2022 and the Coalition's other product stewardship efforts will continue to protect and safeguard RCF and other fiber workers while simultaneously conserving the regulatory resources of the Occupational Safety and Health Administration (OSHA).

The members of the HTIW Coalition are Thermal Ceramics, Inc., Alkegen, HarbisonWalker International and Nutec. These four companies produce all of the RCF manufactured in North America. HTIW Coalition members also produce polycrystalline aluminosilicate fibers and alkaline earth silicate wools. These fibers of low bio persistence and reduced respirability have chemical compositions dramatically different from RCF. As discussed in PSP 2022, these fiber products also are subject to the product stewardship efforts of Coalition members.

PSP 2022 is the fifth iteration of HTIW Coalition's RCF product stewardship program first endorsed by OSHA in 2002 as PSP 2002, renewed in 2007 as PSP-HTW, in 2012 as PSP 2012 and in 2017 as PSP 2017. Like its predecessors, PSP 2022 is designed to encourage feasible and necessary control of fiber exposure in the workplace and thereby reduce any potential risk that could be posed by such exposure. The HTIW Coalition and its member companies seek OSHA's continued support and endorsement



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of PSP 2022, and continuation of a cooperative program that promotes the health and safety of fiber workers nationwide.

PSP 2022 is intended to take effect immediately, seamlessly following PSP-2017, and to remain in effect for a period of five years. The HTIW Coalition will submit annual reports to OSHA on implementation of PSP 2022, and at the close of the five-year term the Coalition will consider further voluntary programs with OSHA.

We would like to express our appreciation to you and the staff at OSHA for the support we have received during PSP-2017 and look forward to working with you as we move forward with PSP 2022.

Respectfully submitted,

For HTIW Coalition  
Roger Balcerak  
President

For Thermal Ceramics, Inc.  
Roger Balcerak  
Director, Environmental, Health and Safety,  
Thermal Ceramics Americas

For HarbisonWalker International  
Dylan Miller  
Administrator, Corporate EHS

For Alkegen  
Dean Venturin, Ph.D.  
Director, Product Stewardship

For Nutec  
Damaso Ortiz  
General Manager, Mexico